



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NMA:EAG/JDG/CMP
F.#2008R00530

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 21, 2011

By ECF and Hand Delivery

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Thomas Gioeli, et al.
Criminal Docket No. 08-240 (S-6) (BMC)

Dear Judge Cogan:

The government respectfully submits this letter to request that the Court unseal the government's motion, dated November 22, 2011, to defer disclosure of certain materials discoverable pursuant to Rule 16 of the Federal Rules of Criminal Procedure ("Rule 16") material and the Jencks Act, and any Orders issued in connection therewith.

Respectfully submitted,

LORETTA E. LYNCH
United States Attorney

By: /s/
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